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10 Attorneys for Defendants
11 NATIONAL INVESTMENT CONSULTANTS, INC., and
12 WEI M. TSE a.k.a. RAYMOND TSE, and for Relief
13 Defendant THERESA C. WONG,
14

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DIVISION OF CALIFORNIA**
17 **SAN FRANCISCO DIVISION**

18 U.S. COMMODITY FUTURES TRADING
19 COMMISSION and THE COMMISSIONER OF
20 CORPORATIONS OF THE STATE OF
21 CALIFORNIA,

22 Plaintiffs,

23 vs.

24 NATIONAL INVESTMENT CONSULTANTS,
25 INC, a California corporation, PACIFIC BEST
26 GROUP LTD, a.k.a. PACIFIC BEST
27 COMPANY LTD, a British Virgin Islands
28 Corporation, YI KERRY XU, an individual,
RUN PING ZHOU a.k.a. FLORA ZHOU, an
individual, and WEI M. TSE a.k.a. RAYMOND
TSE, an individual,

Defendants,

and

THERESA C. WONG, an individual,

Relief Defendant.

CASE NO.: 052641 JSW

STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING TIME FOR
SERVICE OF EXPERT WITNESS
DISCLOSURES AND REPORTS

(No Hearing Set/USDC Civil L.R.
6-2)

Judge: Hon. Jeffrey S. White

RECITALS

WHEREAS on November 3, 2005, the Court ordered disclosure of all expert witnesses and reports to be served by March 31, 2006;

WHEREAS on March 27, 2006, Defendants' expert witness, Gordon Rausser, advised that he was en route to testify at a trial in New York and that he expected the trial to last all week. Consequently, Mr. Rausser requested additional time in order to prepare his report;

WHEREAS counsel for Defendants has informed plaintiffs United States Commodity Futures Trading Commission and the Commissioner of Corporations for the State of California (hereinafter collectively "Plaintiffs") of Mr. Rausser's inability to complete his report by Friday March 31, 2006;

WHEREAS all parties through their counsel of record have agreed that disclosure of all expert witnesses and reports may be extended two weeks and may be served on or before April 14, 2006;

WHEREAS, granting the motion will not affect any hearings or proceedings on the Court's calendar and will not affect the schedule of this case;

WHEREAS, this court has ordered one prior time modification in this case Pursuant to Northern District Rule 6-3 and the parties have agreed to one prior time modification by stipulation.

STIPULATION

The parties hereby agree and stipulate, subject to approval of this Court, that the parties shall have up to and including April 14, 2006, to serve their disclosure of expert witnesses and reports.

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1 Dated: March 28, 2006

THELEN REID & PRIEST LLP

2
3 By 

4 EDWARD GARTENBERG

ALEXANDRA EPAND

5 ROBERT A. WEIKERT

Attorneys for Defendants

6 PACIFIC BEST GROUP LTD, a.k.a. PACIFIC BEST

7 COMPANY LTD, NATIONAL INVESTMENT

CONSULTANTS, INC.; WEI M. TSE a.k.a.

8 RAYMOND TSE, and for Relief Defendant THERESA

9 C. WONG

10
11 Dated: March __, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

12
13 By _____

14 KEVIN K. BATTEH

JAMES H. HOLL, III

15 ERIN E. VESPE

Attorneys for Plaintiff

16 U.S. COMMODITY FUTURES TRADING

17 COMMISSION

18 Dated: March __, 2006

19 COMMISSIONER OF CORPORATIONS OF THE STATE
20 OF CALIFORNIA

21 By _____

22 WAYNE STRUMPFER

ALAN S. WENGER

23 EDWARD KELLY SHINNICK

Attorneys for Plaintiff

24 COMMISSIONER OF CORPORATIONS OF THE
25 STATE OF CALIFORNIA
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28

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10 CONSULTANTS, INC.; WEI M. TSE a.k.a.
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12 C. WONG

11 Dated: March 28, 2006

U.S. COMMODITY FUTURES TRADING COMMISSION

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15 JAMES H. HOLL, III
16 ERIN E. VESPE
17 Attorneys for Plaintiff
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COMMISSIONER OF CORPORATIONS OF THE STATE
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U.S. COMMODITY FUTURES TRADING COMMISSION

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17 Attorneys for Plaintiff
18 U.S. COMMODITY FUTURES TRADING
19 COMMISSION

18 Dated: March 28 2006


COMMISSIONER OF CORPORATIONS OF THE STATE
OF CALIFORNIA

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21 By  _____

22 WAYNE STRUMPFER
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24 EDWARD KELLY SHINNICK
25 Attorneys for Plaintiff
26 COMMISSIONER OF CORPORATIONS OF THE
27 STATE OF CALIFORNIA
28

1 Dated: March 27, 2006

COTTON & GUNDZIK, LLP

2
3 By 
4 JOHN W. COTTON
5 Attorneys for Defendant
6 YI KERRY XU

7 Dated: March __, 2006

LAW OFFICES OF FRED S. KONIGSBERG

8
9 By _____
10 FRED S. KONIGSBERG
11 Attorneys for Defendants
12 RUN PING ZHOU aka FLORA ZHOU and
13 SOUTH CHINA INVESTMENTS, INC.
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1 Dated: March __, 2006

COTTON & GUNDZIK, LLP

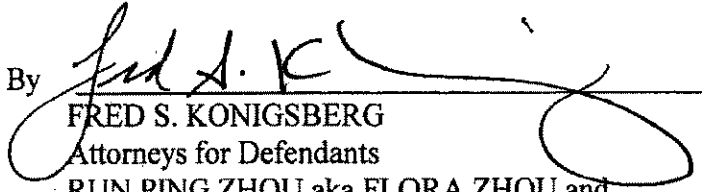
2
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~~PROPOSED~~ ORDER

Pursuant to Stipulation, the parties shall have up to and including April 14, 2006 to serve their disclosure of expert witnesses and reports.

IT IS SO ORDERED.

Dated: March 28, 2006


HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT COURT
JUDGE